

Exhibit K

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION

IN RE: ETHICON, INC.,	MASTER FILE NO.
PELVIC REPAIR SYSTEM	2:12-MD-02327
PRODUCTS LIABILITY LITIGATION	
	MDL 2327

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

The Document Relates to:

Constance Daino v. Ethicon, Inc.

Case No. 2:12-cv-01145

DEPOSITION OF SHELBY F. THAMES, Ph.D.

Taken at Butler Snow
1020 Highland Colony Parkway, Suite 1400,
Ridgeland, Mississippi,
on Thursday, March 24, 2016,
beginning at approximately 2:43 p.m.

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20	Exhibit No. 1, Amended Case Specific Report of	
	Shelby F. Thames, PhD, Constance Daino vs.	
21	Ethicon, Inc., March 22, 2016.....	5
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S T I P U L A T I O N

It is hereby stipulated and agreed by
respective attorneys of record, that this
deposition may be taken at the time and place
hereinbefore set forth, by AMY M. KEY, Court
Reporter and Notary Public, pursuant to the Rules;
That the formality of reading and
signing is specifically RESERVED;
That all objections, except as to the
form of the questions and the responsiveness of
the answers, are reserved until such time as the
deposition, or any part thereof, may be used or
sought to be used in evidence.

Shelby F. Thames, Ph.D.

1 SHELBY F. THAMES, Ph.D.,
2 having been first duly sworn,
3 was examined and testified as follows:

4 EXAMINATION

5 BY MR. BOWMAN:

6 Q. So, Doctor, it's me again, Mike Bowman. I
7 haven't handed you an exhibit. But you have a
8 report in front of you. Who is it for?

9 A. It's for Constance Daino.

10 MR. BOWMAN: Could we mark that as an
11 Exhibit 1 to this deposition, please?

12 (EXHIBIT NO. 1 MARKED.)

13 BY MR. BOWMAN:

14 Q. So, Doctor, have you seen this report
15 before?

16 A. Yes, sir, I wrote it.

17 Q. Did you have a chance to review it before
18 the deposition began?

19 A. Briefly.

20 Q. Have you ever met Ms. Daino?

21 A. No, sir.

22 Q. Do you know if I am pronouncing her last
23 name correctly?

24 A. I do not know, sir. I'm hoping I am.

25 Q. I believe it's Daino. As I understand it,

1 you finalized this report on March 22nd; is that
2 right?

3 A. Yes, sir.

4 Q. And you also, as in the Stubblefield case,
5 worked with Dr. Kevin Ong at Exponent Labs; is that
6 correct?

7 A. I did, sir.

8 Q. And everything you testified to with
9 respect to your working relationship with Dr. Kevin
10 Ong previously, did that hold true in this case as
11 well?

12 A. Yes, it does.

13 Q. Do you know were there -- is there
14 anything that sticks out to you about the protocol
15 used in this case that didn't hold true in the
16 Stubblefield case?

17 A. The protocol, no, but the sample was
18 different.

19 Q. The sample was different?

20 A. Yeah. It was dry when we received it.

21 Q. Can you explain that?

22 A. It was not in formaldehyde, and so there
23 were decomposition products, as was the case with
24 Ms. Stubblefield.

25 Q. Ms. Stubblefield was dry as well?

1 A. No. When we got it, it was in
2 formaldehyde. But the fact that it had these
3 decomposition products meant at some point in time,
4 between the time the explant had got to me, it had
5 to be dry at some point because of the decomposition
6 products.

7 Q. Do you have any idea when that might have
8 happened?

9 A. No, sir.

10 Q. Not with respect to Ms. Stubblefield, but
11 with respect to Ms. Daino?

12 A. No, sir, I don't know.

13 Q. So Ms. Daino's mesh came to you in a dry
14 format --

15 A. Yes, sir.

16 Q. -- with tissue attached?

17 And your light microscopy photo in figure
18 3 is representative of how you found it?

19 A. Yes, sir.

20 Q. Now, you didn't take this photo?

21 A. No, sir, my associate did.

22 Q. And just to talk again about what we
23 talked about in the last deposition, the figure 2
24 pristine TVT mesh, do you see that?

25 A. Yes, sir.

1 Q. Do you know if that's a laser cut mesh or
2 a mechanically cut mesh?

3 A. As we stand here today, I don't know, but
4 I could probably find out if I went through the
5 documents.

6 Q. Does it look like a laser cut mesh to you?

7 A. It's hard to say, sir, from the -- I
8 cannot be definitive.

9 Q. Okay. With respect to this laser cut
10 mesh, is it your understanding that it went through
11 the same cleaning process as the mesh that -- as
12 Ms. Daino's mesh went through?

13 A. Yes.

14 Q. And by that, of course, I mean that it
15 went through five cleaning processes as Ms. Daino's
16 mesh did?

17 A. Yes, sir.

18 Q. If we look at figure 4, you did 100 times
19 magnification?

20 A. Yes, sir.

21 Q. And this is under light microscopy; is
22 that correct?

23 A. Yes, sir.

24 Q. And this is of the mesh as it was produced
25 to you; is that correct?

1 A. It was before cleaning, and it's a
2 beautiful -- it shows a lot of stuff.

3 Q. What does it show?

4 A. Well, if you'll look at the -- this area
5 right here (indicating), that is protein material
6 that was on the surface of the explant, and it's
7 peeled back. And you notice right here at the
8 bottom, I'm pointing at the bottom to the -- the
9 almost bottom fiber on the far left, the same thing
10 is here, and that's a classical example of what
11 we're seeing for this material that's on the surface
12 of Prolene. Now, this is before anything has been
13 done to it.

14 Q. I understand.

15 A. And what we're going to find out is once
16 this is put through the first washing step, cleaning
17 step, that will disappear because it's so fragile.

18 Q. So looking at this photograph in figure 4,
19 do you notice that in the direct center, down
20 here --

21 A. Yes, sir.

22 Q. -- that it appears that the protein has
23 been disturbed?

24 A. Yes. It's coming off the fiber.

25 Q. So, actually, that's not what I'm looking

1 at. I'm looking at the jigsaw puzzle aspect of the
2 protein. So it looks like there's a protein sheath
3 there, and it's been disturbed either by your
4 photographer or in shipping.

5 Do you see how they connect together?

6 A. Well, to some degree, but not -- I also
7 see how, if this is laid back over this fiber, it
8 would have been right here where my little small
9 finger is pointing, which it's hard to, obviously,
10 say on the telephone and what else. But it could
11 have been laid back this way, and this would be this
12 way, right in this clear area right here and this
13 clear area right here.

14 Q. Do you think your associate disturbed that
15 protein on purpose or that layer of tissue or
16 whatever that is on purpose?

17 A. No, sir. I think that's the way it came
18 to us. It had been -- obviously, it was disturbed
19 because it was received from the hospital. It was
20 transmitted down to Kevin Ong's lab. He put it in a
21 different container. He had washed it, and he sent
22 it down to us.

23 Q. Can I see the exhibit for a second?

24 A. Sure.

25 Q. I'm just going to circle the portion that

1 I was asking you to look at as far as the jigsaw
2 nature of it.

3 Do you see what I'm marking as being
4 disturbed on this?

5 A. I do.

6 Q. So do you agree with me that at some point
7 that was connected or seems to be at some point that
8 was all one larger piece of protein or tissue?

9 A. I can't say. There's a possibility that
10 it was, but I can't say for sure that it was.

11 Q. Do we see the same thing -- if you just
12 look directly above it, it looks like there's sort
13 of the same thing going on there. There's like a
14 matrix of collagen or tissue, and there's some
15 see-through portions of it?

16 A. Yeah, it's translucent material that we're
17 talking about, right.

18 Q. I think so. If that's what you're calling
19 it, yes. To me, it sort of looks like a thin layer
20 of collagen or protein or something like that.

21 With respect to this mesh, does anything
22 else jump out at you?

23 A. No, sir, not really.

24 Q. Okay. How about the fact there's no blue
25 filaments?

1 A. Well, it's an all-clear mesh.

2 Q. So this would have been implanted prior to
3 2003 or something like that?

4 A. Yes, sir, right. I think it was 2003.
5 And I think, if I remember, they started using
6 colored mesh in like 2003, 2000 and 2003. So this
7 could have been something that had on -- and I don't
8 know. I'm speculating here that there might have
9 been some that they had reserved that hadn't been
10 used before.

11 Q. With respect to the second full paragraph
12 on this page, which is page 4, it states -- you talk
13 about patient 4 from your general report.

14 Do you see that?

15 A. Yes, I do.

16 Q. And it talks about -- and patient 4 had
17 blue pigmented material, correct?

18 A. Yes, sir.

19 Q. And you actually make the reference that
20 both clear Prolene and pigmented Prolene are
21 translucent under light microscopy.

22 Do you see that?

23 A. I do.

24 Q. Is there any statement in here that
25 Ms. Daino -- let me see this. So this entire

1 paragraph is in reference to patient 4. This is not
2 in reference to Ms. Daino at all?

3 A. That's essentially correct, yes, sir.

4 Q. So you're not saying anything about any
5 findings that you made on Ms. Daino's mesh in this
6 paragraph?

7 A. I'm giving an example of what we had done
8 before on patient 4.

9 Q. That doesn't -- does that have any --

10 A. Not directly to --

11 Q. Ms. Daino?

12 A. Ms. Daino, yes.

13 Q. Okay. Thank you.

14 With respect to figure 5, --

15 A. Yes, sir.

16 Q. -- do you see any flakes or bark hanging
17 off of the figure itself?

18 A. Yes. But there's more flesh here than --
19 see, what we were looking at before in figure --
20 well, before cleaning was material that hadn't been
21 cleaned at all. Now then, it has been cleaned a
22 step, and we see that we have disturbed some of the
23 flesh around the fibers. We're seeing more of the
24 fibers, and we're also seeing some flaking. You can
25 see it here. Obviously --

1 Q. Can you mark it?

2 A. Obviously, the flakes won't be as long and
3 prominent because they've been through a cleaning
4 step.

5 Q. Can you mark where you see some flakes,
6 please?

7 A. Sure. It's a little difficult to find
8 here because we've still got flesh on it.

9 Q. So with respect to figure 5, I can see at
10 least three or four portions where it's not clear?

11 A. That's correct.

12 Q. Do you see those?

13 A. Yes.

14 Q. So just seeing those alone is something
15 that would -- you would take the FTIR, do the light
16 microscopy, do the SEM.

17 Would you do SEM at this point?

18 A. Yes, sir.

19 Q. And then you would send it back to Kevin
20 Ong, correct?

21 A. Yes, sir.

22 Q. For more cleaning?

23 A. Yes, sir.

24 Q. But your determination wouldn't have been
25 made on sending it back to Kevin Ong until you saw

1 the results of the FTIR, SEM and light microscopy?

2 A. That's right.

3 Q. Okay. So getting into the next page,
4 there's a reference to blue fiber again?

5 A. Yes, sir.

6 Q. And this one appears to actually reference
7 it with Ms. Daino.

8 A. Where are we, sir?

9 Q. Sure. Page 5, the section entitled,
10 "Chemical Structure Analysis by FTIR Spectroscopy."

11 A. What paragraph?

12 Q. The very first one.

13 So the second sentence reads, "The layer
14 on the blue fiber is clear, not blue, again
15 confirming its composition is not Prolene. If it
16 were degraded Prolene, it would be blue, and it is
17 not."

18 Do you see that?

19 A. Yes.

20 Q. Does that belong in this report?

21 A. Well, it's used there as a comparison.

22 Q. Okay.

23 A. The clear fiber is -- you can make a
24 comparison when you have a blue and a clear. And I
25 wanted to make the comparison between patient 4,

1 which we talked about earlier today, which was
2 Ms. Ramirez, and so I use that here as a comparison,
3 that the blue fiber in Ms. Ramirez was translucent
4 material, just like the material here is translucent
5 material. Neither her translucent material was
6 blue, as this is not blue.

7 Q. So way the sentence reads, "The layer in
8 the blue fiber is clear, not blue, again confirming
9 its composition is not Prolene."

10 A. Right.

11 Q. And then it says, "Daino 1.1," and that's
12 figure 5?

13 A. Well, that was meant to be Ms. Ramirez. I
14 guess I made a mistake here. Let me check it out.
15 This is clear fiber.

16 Oh, I say in the first sentence, "It's
17 also important to note the identical translucent
18 nature of the cracked and peeling material on both
19 the blue and clear fibers as shown in patient 4,
20 examples in my general report. The layer on the
21 blue fiber is clear, not blue, again confirming its
22 composition is not Prolene, Daino 1.1, comparatively
23 speaking."

24 Q. So, again, I don't see any flaking, and I
25 don't see any blue on Ms. Daino's.

1 A. There is none. I'm trying to draw a
2 comparison between Ms. Ramirez and Ms. Daino, so
3 that's the only thing I'm trying to do here.

4 Q. Okay. Without blue fibers?

5 A. That is correct, sir.

6 Q. Anywhere in this report is there a photo
7 from patient 4?

8 A. Let me see. No, sir.

9 Q. So with respect to the first paragraph and
10 the second paragraph, you are merely referencing
11 this case-specific report back to your general
12 causation report; is that right?

13 A. Yes, sir.

14 Q. And there is nothing specific that you can
15 relate with with blue fibers or with any kind of
16 photograph showing translucent blue fibers --
17 translucent cracks in blue fibers to Ms. Daino; is
18 that correct?

19 A. It was used only as an example.

20 Q. The next paragraph, it goes to -- it
21 starts describing the FTIR in figure 6.

22 Do you see that?

23 A. Yes.

24 Q. And in figure 6 we see that there is --
25 there are bumps and valleys in between the area of

1 3000 and 3600.

2 Do you see that?

3 A. Yes, sir.

4 Q. And that's the general area where a
5 carboxyl group would be?

6 MR. HUTCHINSON: Object to form.

7 THE WITNESS: In that general area, yes,
8 sir.

9 BY MR. BOWMAN:

10 Q. And with respect to the area between 1650
11 and 1750, we do see at least two peaks and maybe one
12 broad range, and this is an area where we would
13 expect to see carbonyls; is that correct?

14 A. Well, you see two carbonyls, one is -- and
15 the two peaks, the one at 15 and 16, are
16 representative of proteins. And the 1654 is
17 representative of the carbonyl group frequency of
18 the proteins. And the 1741 is representative of
19 decomposition products that we talked about earlier,
20 because we received this explant dry. And, here
21 again, we see the 1741 peak.

22 Q. Besides your knowledge of knowing that
23 these peaks and valleys overlap between the hydroxyl
24 group and carbonyl group --

25 A. Now, wait a minute. That's not correct.

1 Q. I'll repeat the question. Go ahead.

2 MR. HUTCHINSON: I don't think there's a
3 question pending.

4 BY MR. BOWMAN:

5 Q. I'll withdraw the question, and I'll
6 reask.

7 A. Okay. Thank you.

8 Q. With respect to the peaks in the 1650 to
9 1750 range that you just identified as having to do
10 with decomposition and amide groups; is that right?

11 A. The 1654 peak is the C=O of the amide
12 group, A-M-I-D-E. The 1741 is an ester peak coming
13 from a decomposition product.

14 Q. Now, besides the fact that you know that
15 that's where a carbonyl would show up, isn't this
16 also where a carbonyl would show up on oxidized
17 polypropylene?

18 A. That could be the same reason, yes, sir.

19 Q. And with this sample you -- with this
20 sample, was any care taken to preserve any oxidized
21 polypropylene that might be on the mesh?

22 A. The cleaning protocol itself was a
23 caretaking process to try to make certain that
24 what's on the explant when we received it was on the
25 explant when we looked at it the last time, with the

1 exception of proteins.

2 Q. Now, can the same be said with respect to
3 the carboxyl groups between the area of 3000 and,
4 say, 3600?

5 A. Yes.

6 Q. And the --

7 A. No. Wait a minute. You said carboxyl
8 groups? You're getting your chemistry wrong.

9 Q. I am. So the hydroxyl group between the
10 area of, say, 3000 and 3600?

11 A. In that range, yes, sir.

12 Q. By hydroxyl group, can you tell me --
13 well, what do you understand a hydroxyl group to be?

14 A. A COH.

15 Q. And what do you understand a carbonyl to
16 be?

17 A. A C=O.

18 Q. And the cleaning protocol itself didn't
19 run oxidized polypropylene through it, did it, as a
20 control?

21 That didn't happen?

22 A. No, sir.

23 Q. With respect to any other part of the
24 cleaning process, was oxidized polypropylene used?

25 A. Now, you're talking -- you keep talking

1 about oxidized polypropylene.

2 Do you really mean that?

3 Q. What I mean to say is --

4 A. I didn't use polypropylene.

5 Q. You used Prolene?

6 A. I used Prolene.

7 Q. What I mean to say is that for any one of
8 the steps, we're talking about the -- let's just
9 stick with the Proteinase K.

10 Did you put -- did you purposefully
11 oxidize Prolene and then put it through that step of
12 the cleaning process?

13 A. No, sir.

14 Q. And did you do that with any of the steps
15 of the cleaning process?

16 A. No, sir.

17 Q. But you did use pristine Prolene as a
18 control, and you did use a pristine Prolene sample
19 in Ms. Daino's case, TVT mesh?

20 A. Yes, sir, that's correct.

21 Q. And you ran that through the cleaning
22 process?

23 A. That's correct.

24 Q. With respect to figure 7, --

25 A. Yes, sir.

1 Q. -- that is the before cleaning tissue
2 between fibers --

3 A. Yes, sir.

4 Q. -- overlaid in red?

5 And then the collagenase, Type VII, high
6 purity, this is just like a textbook exemplar as
7 overlaid in blue?

8 A. Yes, sir.

9 Q. Can you tell me -- what do you see at
10 1742?

11 A. The purpose of that spectra was to show
12 you the peak at 1742 was in the tissue between
13 fibers, but not in collagenase, and that's the -- so
14 it's not unique to collagenase, so it has to be
15 unique to something else. And that means it's
16 unique to the tissue sample itself.

17 Q. So this tissue sample --

18 A. It's not proteins.

19 Q. Right.

20 So this sample itself came to you
21 decomposed?

22 A. Yes, sir.

23 Q. Almost entirely?

24 MR. HUTCHINSON: Object to form.

25 THE WITNESS: Well, it was decomposed.

1 I don't know to what extent it was
2 decomposed.

3 BY MR. BOWMAN:

4 Q. It wasn't -- I'll strike the question.
5 It wasn't preserved in any way?

6 A. When we received it, it was not preserved.
7 I cannot tell you what happened to it prior to our
8 receiving it or Dr. Ong.

9 I could ask Dr. Ong what happened before
10 he picked it up -- when he picked it up. But before
11 that, I don't know who had it, for how long or what
12 they did with it.

13 Q. Would this figure, figure 7, have been
14 more instructive if you had laid in the background
15 instead of collagenase some kind of collagen that
16 had been decomposed, an FTIR of that?

17 A. No, I don't think so. No, sir, I don't
18 believe so.

19 Q. My question is just simply then that would
20 just tell me immediately that 1742 is decomposed
21 collagen?

22 A. Well, this tells you it is because the
23 protein is a carbonyl group itself, and it's right
24 next to it. It has a carbonyl group in it itself,
25 and that's at 1654. We talked about that just a few

1 seconds ago. And then you have another carbonyl
2 group that's showing up at a different frequency.

3 So no, sir, to answer your question.

4 Q. With respect to figure 8, --

5 A. Yes, sir.

6 Q. -- you had the before cleaning clear
7 fiber, and then you have the before cleaning tissue
8 between fibers; is that correct?

9 A. Yes, sir.

10 Q. And the peaks appear to be the same.

11 And this is just what you were saying.

12 The peaks appear to be the same, but they are at a
13 much higher concentration in the between fibers,
14 aren't they?

15 MR. HUTCHINSON: Object to form.

16 THE WITNESS: Yes, they are, as you
17 would expect them to be. Because this is
18 decomposition of the tissue that's taking
19 place, which is between the fibers, not
20 Prolene.

21 BY MR. BOWMAN:

22 Q. I get the answer.

23 With respect to the hydroxyl groups,
24 why -- you know, I'm going to strike that question.

25 Moving on to figure 9, this is the figure

1 that encompasses all of the FTIRs that you took for
2 this mesh; is that correct?

3 A. Yes, sir, from before cleaning to after
4 step five.

5 Q. Now, with respect to the -- if we just
6 look at after cleaning five, which appears to be
7 gold, it has the lowest ranges possible.

8 It appears to have the lowest ranges
9 possible out of all of the FTIRs; is that correct?

10 A. It shows you how effective our cleaning
11 process was, yes, sir.

12 Q. And that cleaning process is directed by
13 you to send it back to get more cleaning?

14 A. After cleaning five, I keep the explants.

15 Q. So just at five, you wouldn't have gone
16 any further than what is in yellow; is that right?

17 A. That is correct, sir. And the reason is
18 shown on the next page.

19 Q. If we go to the next page and we look at
20 figure 10, it shows that the TVT exemplar, FTIR,
21 clear fibers after cleaning steps; is that right?

22 A. Yes, sir, and they're identical.

23 Q. They appear to be identical.

24 Is there anywhere in the -- do you see a
25 carbonyl peak here in the blue?

1 A. No, sir.

2 Q. So the TVT exemplar after cleaning five --

3 A. It's not supposed to have a carbonyl
4 group, sir. It doesn't have a carbonyl on it. It
5 didn't oxidize.

6 Q. But this is a different part of the TVT
7 exemplar that you looked at, though, right?

8 You didn't look at the same -- you didn't
9 do the FTIR on the same exact spot on every --

10 MR. HUTCHINSON: Object to form.

11 Compound question.

12 BY MR. BOWMAN:

13 Q. Do you want me to withdraw the question?
14 I'll withdraw the question.

15 A. Thank you.

16 Q. And what I'll ask is, did you do FTIR on
17 the TVT exemplar after every cleaning that was done?

18 A. Yes, sir.

19 Q. And where is that data?

20 A. We just looked at them, sir, right here
21 (indicating).

22 Q. This is after cleaning. This is not the
23 exemplar, though. This is of the mesh.

24 A. Well, they are done. I'm sorry. We have
25 them in our documentation somewhere. You have

1 those.

2 MR. HUTCHINSON: They have been produced
3 to counsel already.

4 BY MR. BOWMAN:

5 Q. So there is quite a big peak, isn't there?
6 You don't see a peak at 1740, 1750 on the
7 TVT exemplar?

8 A. No, sir.

9 MR. HUTCHINSON: Object to form.

10 BY MR. BOWMAN:

11 Q. What do you see there?

12 A. Nothing. I see some noise perhaps. You
13 know, I told you earlier that this is not a
14 quantitative measurement. We talked about
15 qualitative measurement. And this is, in my
16 opinion, as close as you're going to be being
17 identical in a qualitative spectra that you can
18 achieve.

19 Q. But isn't the FTIR just on one portion of
20 the --

21 A. Yes, sir. But it's not quantitative in
22 terms of telling you the exact amounts of materials
23 that are there. So if there's a slight difference
24 in the peak height here, in the red, for instance,
25 the clear microscopy spectra of that fiber, that

1 doesn't mean that it's not identical to the blue.
2 It's just qualitative and not quantitative.

3 Q. That's my point. I don't see a peak in
4 the one that you cleaned after the one that was
5 explanted from Ms. Daino. I don't see --

6 A. I don't either. They look identical to
7 me.

8 Q. Okay. But we're looking at the same
9 figure, figure 10?

10 A. Yes, sir, we are.

11 Q. With respect to your SEM opinions again --
12 strike that.

13 With respect to your SEM opinions, do you
14 have anything in a peer review literature that would
15 support the opinion that the extrusion lines would
16 degrade along with the outer surface of the Prolene
17 fiber?

18 A. If there was oxidation of Prolene, it is
19 my opinion that extrusion lines would be interfered
20 with. They are not here. I have not seen that
21 written in another document, is my belief.

22 And you can see the extrusion lines being
23 maintained all the way from an SEM -- well, about
24 one, but certainly three. And you can see the
25 transverse cracking and extrusion lines are still

1 there.

2 And you see how difficult it is to get all
3 the proteins off? You see these little portions
4 there? That continues to be proteins on there. And
5 then you see number five, and we've got a really
6 clean spectra.

7 Q. You mean a clean image?

8 A. Yes, full micrograph spectra, clean image,
9 yes, sir.

10 MR. BOWMAN: I'm done. I pass.

11 MR. HUTCHINSON: Just a quick break.

12 (A BREAK WAS TAKEN.)

13 MR. HUTCHINSON: We don't have any more
14 questions. Thank you.

15 (CONCLUDED AT 3:15 P.M.)

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1 CERTIFICATE OF COURT REPORTER

2 I, Amy M. Key, CSR, and Notary Public in
3 and for the County of Lamar, State of Mississippi,
4 hereby certify that the foregoing pages, under
5 penalty of perjury, contain a true and correct
6 transcript of the testimony of the witness, as
7 taken by me at the time and place heretofore
8 stated, and later reduced to typewritten form by
9 computer-aided transcription under my supervision
10 and to the best of my skill and ability.

11 I further certify that I placed the witness
12 under oath to truthfully answer the questions in
13 this matter under the power vested in me by the
14 State of Mississippi.

15 I further certify that I am not in the employ
16 of or related to any counsel or party in this
17 matter, and have no interest, monetary or
18 otherwise, in the final outcome of the
19 proceedings.

20 Witness my signature and seal this the
21 _____ day of _____, 2016.

22

23

AMY M. KEY, CSR

24

My Commission Expires June 19, 2016

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